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Attorney for RENEE HERMANN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,) No. 2:24-cr-304 TLN
Plaintiff,)
) STIPULATION AND ORDER
v.) TO CONTINUE SENTENCING HEARING
)
FRANCISCO CORNEJO-QUEZADA,) Requested date: 7-10-2025
SHAWN ERIC MORALES, SR., and) Time: 9:30 a.m.
RENEE MICHELLE HERMANN,) Judge: Hon. Troy L. Nunley
Defendants.)
=====)

It is hereby stipulated between the parties, Emily Sauvageau, Assistant United States Attorney, John Manning, attorney for defendant FRANCISCO CORNEJO-QUEZADA, Mark Reichel, attorney for defendant SHAWN ERIC MORALES, SR, and Michael D. Long, attorney for defendant RENEE HERMANN, that the status hearing set for April 24, 2025, at 9:30 a.m., before Judge Nunley, should be continued and re-set for July 10, 2025, at 9:30 a.m., before Judge Nunley.

Each party has agreed to move the status hearing, with the Court's permission, to July 10, 2025. All parties are available to appear, and they all agree to appear, in court in-person on July 10, 2025, unless the defendant has a valid waiver of appearance on file.

The parties further agree that this court should make a finding of good cause for the requested extension and that in fact good cause is hereby shown. The government has provided over 500 pages of discovery along with dozens of audio and video recordings. All attorneys continue to read and view the discovery, investigate the case and meet with their respective clients. Counsel for

1 defendants believe that failure to grant the above-requested continuance would deny counsel the
2 reasonable time necessary for effective preparation, taking into account the exercise of due
3 diligence.

4
5 Each party further stipulates that the ends of justice served by granting such continuance
6 outweigh the best interests of the public and of all the defendants in a speedy trial. Time has already
7 been excluded through April 24, 2025.

8 The request for extending the date for the status conference is at the specific request of each
9 of the defendants and with the knowing, intelligent and voluntary waiver of each defendant's speedy
10 trial rights under the law. The government agrees that a continuance is necessary. Good cause is
11 hereby shown.

12
13 For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,
14 within which trial must commence, the time period from today's date to July 10, 2025, inclusive,
15 is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it
16 results from a continuance granted by the Court at defendants' request on the basis of the Court's
17 finding that the ends of justice served by taking such action outweigh the best interest of the
18 public and the defendant in a speedy trial.

19
20
21 Dated: April 18, 2025

Respectfully submitted,

22 /s/ Michael D. Long

23 MICHAEL D. LONG
24 Attorney for Renee Hermann

25 /s/ John Manning

26 JOHN MANNING
27 Attorney for Francisco Cornejo-Quezada

28 ///

/s/ Mark Reichel

MARK REICHEL
Attorney for Shawn Morales, Sr.

Dated: April 18, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Emily Sauvageau

EMILY SAUVAGEAU
Assistant U.S. Attorney


ORDER

GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.

The date for the status hearing in this matter is hereby re-set for **July 10, 2025, at 9:30 a.m.**, before District Court Judge Troy A. Nunley.

Time is is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Time is excluded through the new hearing date of July 10, 2025.

Dated: April 18, 2025



Troy L. Nunley
Chief United States District Judge